

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CAROLYN GARDNER

v.

KUTZTOWN UNIVERSITY, *et al.*

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:  
:  
:

C.A. No. 22-1034

PLAINTIFF'S MOTION FOR ATTORNEYS FEES AND COSTS

Pursuant to Section 794a of the Rehabilitation Act of 1973 and 42 U.S.C. §1988, Plaintiff Carolyn Gardner, through her undersigned counsel, respectfully moves the Court for an award of attorneys fees and costs in connection with the above-captioned lawsuit. For all the reasons set forth in the attachments to this Motion and the Memorandum of Law, Plaintiff is the prevailing party, and is entitled to reimbursement of all reasonable costs and attorneys fees she and his attorneys incurred in the successful prosecution of her case.

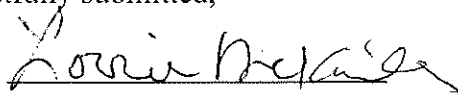
The adjusted lodestar for which Plaintiff is seeking reimbursement is \$942,045.00 as

follows:	McKinley & Ryan, LLC	\$829,600.00
	Ralph Lamar, Esquire	\$118,140.00

Plaintiff is also seeking \$5023.90 in litigation costs as evidenced in the Appendix to this Motion, Exhibit C.

Respectfully submitted,

By:



**LORRIE McKINLEY**  
**McKINLEY & RYAN, LLC**  
238 West Miner Street  
West Chester, PA 19382  
(610) 436-6060

Attorney for the Plaintiff

**RALPH LAMAR**

4728 Hamilton Blvd.  
Allentown, PA 18103  
610-563-0726

Attorney for the Plaintiff

DATE: February 4, 2025

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>CAROLYN GARDNER</b>	:	
	:	
Plaintiff	:	CIVIL ACTION
	:	
	:	NO. 22-1034
v.	:	
	:	
<b>KUTZTOWN UNIVERSITY, <i>et al.</i></b>	:	
	:	

**APPENDIX TO PLAINTIFF'S MOTION FOR ATTORNEY'S FEES**

Exhibit A	Declaration of Lorrie McKinley, Esquire
Exhibit B	Curriculum Vitae for Lorrie McKinley, Esquire
Exhibit C	Invoice, McKinley & Ryan, LLC for Stephen Oross
Exhibit D	Summary of Costs and Invoices
Exhibit E	Declaration of Ralph Lamar, Esquire
Exhibit F	Lamar Invoice for Stephen Oross
Exhibit G	Community Legal Services Fee Schedule, January 19, 2023
Exhibit H	Declaration of Marc Weinstein, Esquire
Exhibit I	Declaration of Scott Pollins, Esquire
Exhibit J	Declaration of Brian Foley, Esquire

DATE: February 4, 2025

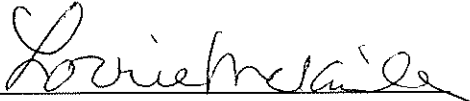
**CERTIFICATE OF SERVICE**

I hereby certify that on this date, February 4, 2025, a true and correct copy of the foregoing Plaintiff's Motion for Attorneys Fees and Costs and the corresponding Memorandum of Law and Appendix was served upon counsel by way of the Court's ECF system as follows:

**Kevin Bradford, Esquire**  
Senior Deputy Attorney General

**Matthew Skolnik, Esquire**  
Senior Deputy Attorney General

**Pennsylvania Office of Attorney General**  
Eastern Regional Office, Civil Litigation Section  
1600 Arch Street, Suite 300  
Philadelphia, PA 19103

  
**LORRIE MCKINLEY, ESQUIRE**